

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

JOHN M. PITMAN, III, *et al.*,

Plaintiffs,

- vs -

XCENTRIC VENTURES, LLC.,
et al.,

Defendants.

Civil No.:

4:16-cv-00179-HCM-DEM

4:17-cv-00012-HCM-RJK

**EDWARD MAGEDSON AND XCENTRIC VENTURE'S, LLC'S
MOTION FOR A PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c), Edward Magedson ("Magedson") and Xcentric Ventures, LLC ("Xcentric"), respectfully move for entry of a Protective Order to stay discovery pending the resolution of the pending motion to dismiss, or, alternatively, a protective order limiting discovery to non-privileged information that is relevant to the claims and defenses and proportional to the needs of this case and to limit discovery in a manner that comports with the orders in the case of *Xcentric Ventures, LLC, et al., v. Ben Smith*, Case No. 5:15-cv-04008-LTS, pending in the Northern District of Iowa. In support, Magedson and Xcentric submit a memorandum in support filed contemporaneously with this Motion.

Dated: August 17, 2017

Respectfully submitted,

/s/ David A. Warrington

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*Counsel for Edward Magedson and
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August, 2017, the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all authorized users.

/s/ David A. Warrington

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